

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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|--|---|---------------------------|
| <b>LOCAL 786 I. B. of T. SEVERANCE<br/>FUND, and LOCAL 786 BUILDING<br/>MATERIAL WELFARE FUND, and<br/>Trustees MICHAEL YAUGER and<br/>WILLIAM GUTH,</b> | ) |                           |
|  | ) |                           |
|  | ) |                           |
|  | ) |                           |
|  | ) | No. 08 C 1560             |
| Plaintiffs,  | ) |                           |
|  | ) |                           |
| v.   | ) | Judge Castillo            |
|  | ) | Magistrate Judge Schenker |
| <b>VERONICA CONTRACTING, INC., an</b>  | ) |                           |
| <b>Illinois corporation,</b>   | ) |                           |
| Defendant.   | ) |                           |
|  | ) |                           |

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**NOTICE OF MOTION**

To: Daniel V. Kinsella  
Schuyler, Roche & Zwirner  
One Prudential Plaza, Suite 3800  
130 East Randolph Street  
Chicago, Illinois 60601

**PLEASE TAKE NOTICE** that on July 1, 2008 at 9:45 a.m., I shall appear before Judge Castillo in Courtroom 2141, United States District Court, 219 S. Dearborn St., Chicago, Illinois 60604 and present the attached motion for summary judgment against Defendant, Veronica Contracting, Inc. A true copy is hereby served upon you.

s/Anthony Pinelli  
\_\_\_\_\_  
**ANTHONY PINELLI**  
Counsel for Plaintiffs

**ANTHONY PINELLI**  
Law Offices of Anthony Pinelli  
53 West Jackson Boulevard  
Suite 1460  
Chicago, Illinois 60604  
312/583-9270  
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**CERTIFICATE OF SERVICE**

Anthony Pinelli hereby certifies that he served the foregoing Notice and Plaintiffs' Motion for Summary Judgment on

Daniel V. Kinsella  
Schuyler, Roche & Zwirner  
One Prudential Plaza, Suite 3800  
130 East Randolph Street  
Chicago, Illinois 60601

via first class U.S. Mail on June 19, 2008 at 53 West Jackson Blvd., Chicago, Illinois 60604.

s/Anthony Pinelli

**ANTHONY PINELLI**